

Application Serial No. 10/738,399
Reply to Office Action of February 18, 2005

PATENT
Docket: CU-3495

REMARKS/ARGUMENTS

Reconsideration is respectfully requested.

The Specification page 1, line 24 stands objected to for containing a grammatical error. The suggested correction has been made and withdrawal of the objection is respectfully requested.

Claims 1-23 are pending in the present application before this amendment. By the present amendment, Claim 8 has been canceled without prejudice, and Claims 1, 9-10, and 17 have been amended. No new matter has been added.

Claim 17 stands objected to for containing informality. The Examiner's suggested amendment has been made, and withdrawal of the objection is respectfully requested.

Claims 1-2, 4-7, and 13-15 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 4,952,524 (Lee524) in view of U.S. Patent Application Publication No. 2003/0124465 (Lee465). The "et al." suffix, which may appear after a reference name, is omitted in this paper.

Claims 3, 8-12, and 16 are indicated as being allowable if they are rewritten in independent form including all limitations of the base claim and any intervening claims.

In response, Claim 1 has been amended to include all limitations of the allowable Claim 8 to receive a Notice of Allowance in the next action.

However, Applicants respectfully disagree with the Office Action and submit that neither Lee524 nor Lee465 teaches Claim 1.

In particular, Lee524 (in addition to not teaching or suggesting the claimed step of forming a precise insulating layer as acknowledged in the Office Action page 2)

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teaches a "thermal stress-relief layer" (see col. 2, lines 23-25; col. 3, line 66 to col. 4, line 22) in the trench before depositing a "filler material 25." Lee524 teaches that the thermal stress-relief layer 23 is very important for solving the problems described in Lee524, col. 1, lines 34-48 as the thermal stress-relief layer 23 absorbs and softens the thermally generated stresses (see Lee524, col. 6, lines 35-53).

In contradistinction, the presently claimed invention (as recited in Claim 1) does not require such an intermediary layer (i.e., the "thermal stress-relief layer 23" in Lee524) for purposes of stress relief. As claimed and described, a flowing insulating layer is formed inside and is subsequently made precise.

Therefore, even if Lee524 and Lee465 are considered individually or in combination, not every limitation of Claim 1 is taught or suggested.

For the reasons set forth above, Applicants respectfully submit that Claims 1-7 and 9-23, now pending in this application, either has been allowed or are in condition for allowance. Accordingly, Applicants respectfully requests a Notice of Allowance in the next action.

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This amendment is considered to be responsive to all points raised in the Office Action. Should the Examiner have any remaining questions or concerns, the Examiner is encouraged to contact the undersigned attorney by telephone to expeditiously resolve such concerns.

Respectfully submitted,



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